

Shannon S. Thomas (TX Bar No. 24088442)
Kevin D. McCullough (TX Bar No. 00788005)
901 Main Street, Suite 3200
Dallas, Texas 75202
Telephone: (214) 953-0182
Facsimile: (214) 953-0185
kdm@romclaw.com
sthomas@romclaw.com

COUNSEL FOR THE TRUSTEE

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re: § **Chapter 7**
GENESIS NETWORKS TELECOM §
SERVICES LLC § **Case No. 24-33835-MVL**
Debtor. §

**CHAPTER 7 TRUSTEE'S MOTION FOR EXPEDITED HEARING ON
MOTION TO COMPEL TURNOVER OF DEBTOR'S BOOKS AND RECORDS**

**TO THE HONORABLE MICHELLE V. LARSON,
UNITED STATES BANKRUPTCY JUDGE:**

Laurie Dahl Rea, as the Chapter 7 Trustee (the “Trustee”) of the bankruptcy estate of Genesis Networks Telecom Services, LLC (the “Debtor”) files this *Motion for Expedited Hearing on Motion to Compel Turnover of Debtor's Books and Records* (the “Motion to Expedite”), pursuant to which she respectfully requests the Court’s expedited consideration of the *Motion to Compel Turnover of Debtor's Books and Records* (the “Motion to Compel”) [Dkt. No. 127] filed on January 16, 2025. In support of this Motion to Expedite, the Trustee would respectfully show the Court as follows:

1. The Trustee is filing this Motion to Expedite contemporaneously with the Motion to Compel, which respectfully requests the entry of an Order compelling Endeavor Managed Services, Inc. (“Endeavor”) to turn over certain Debtor records.

2. The Motion to Compel is directly related to the *Motion for Order Directing Rule 2004 Examinations of (i) the Debtor, (ii) Endeavor Managed Services, Inc., (iii) Symbiont Ventures, LLC f/k/a Goodman Investments Holdings LLC, and (iv) James Goodman* (the “2004 Motion”) [Dkt. No. 63] filed by FedEx Supply Chain Logistics & Electronics, Inc. (“FedEx”).¹

3. Specifically, Endeavor negotiated with the Movants to reach an agreement which provided for a reduced scope of production pertaining to a more specific and limited timeframe. *See Agreed Order Granting Rule 2004 Examination and Requests for Production of Documents from Endeavor Managed Services, Inc. as Modified Herein* entered on September 5, 2024 (the “Agreed Order”) [Dkt. No. 77].

4. In addition to modifying Endeavor’s scope of production, the Agreed Order also provided:

To the extent that Endeavor has information related to the location and/or sources of data of other Examinees or the Debtor (“Non-Endeavor Data”), Endeavor will (a) disclose such information, (b) preserve the Non-Endeavor Data but not search it at this time and (c) reasonably assist in providing access to, producing, or turning over the Non-Endeavor Data, subject to an agreement of the Parties or further order of this Court.

Agreed Order at pp. 2-3.

5. In this way, the Motion to Compel, which seeks the turnover of “Non-Endeavor Data” as that term is defined in the Agreed Order, relates specifically to the 2004 Motion.

¹ References to the “2004 Motion” herein are also intended to include the Joinders thereto filed by the Trustee and Scott M. Seidel (“Seidel”), as Chapter 7 Trustee of the related bankruptcy case of *In re Goodman Networks, Inc.* (Bankr. No. 22-31641, Bankr. N.D. Tex.). Dkt. Nos. 66, 65. Collectively, FedEx, the Trustee and Seidel shall be referred to herein as the “Movants.”

6. There is a status conference and hearing on the 2004 Motion currently scheduled for Thursday, January 23, 2025 at 1:30 p.m.

7. The Trustee requests that the Motion to Compel be heard on an expedited basis at the same time as the 2004 Motion, because the Motion to Compel is directly related to the 2004 Motion and the particular issue arises therefrom.

WHEREFORE, the Chapter 7 Trustee, Laurie Dahl Rea, respectfully requests that the *Motion to Compel Turnover of Debtor's Books and Records* [Dkt. No. 127] be considered on an expedited basis and set on this Court's docket for **January 23, 2025 at 1:30 p.m.**

Dated: January 17, 2025

Respectfully submitted,

ROCHELLE MCCULLOUGH, LLP

/s/ Shannon S. Thomas

Shannon S. Thomas (TX Bar No. 24088442)
Kevin D. McCullough (TX Bar No. 00788005)
901 Main Street, Suite 3200
Dallas, Texas 75202
Telephone: (214) 953-0182
Facsimile: (214) 953-0185
kdm@romclaw.com
sthomas@romclaw.com

COUNSEL FOR THE TRUSTEE

CERTIFICATE OF CONFERENCE

On January 16, 2025, Trustee's counsel attempted to confer with all parties that may be affected by this request for expedited consideration. The position of the respective parties is as follows:

- i. FedEx Supply Chain Logistics & Electronics, Inc. does not oppose the expedited setting.
- ii. Endeavor Managed Services, Inc. does not oppose the expedited setting.
- iii. Trustee's counsel has attempted to confer with the below parties, but at the time of filing has not heard back from them regarding their position:
 - a. Marty Seidler, as Debtor's counsel; and
 - b. Randy Pulman, as counsel for Symbiont Ventures, LLC fka Goodman Investments Holdings, LLC and James Goodman.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 17, 2025 the above Motion for Expedited Hearing was served on all parties registered to receive electronic notification through the Court's ECF service.

/s/ Shannon S. Thomas
Shannon S. Thomas